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VIA ECF

November 29, 2021

Hon. Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Muñoz v. City of New York*, No. 17-CV-4407 (NRB) (OTW)

Your Honor:

I write to provide the Court with a status update about this action, which is stayed pending resolution of estate-related litigation in the New York State Surrogate's Court, Kings County.

On October 22, 2021, the Surrogate's Court conducted a second mediation session in an effort to resolve all estate-related issues, including Plaintiff's pending application under New York Estates, Powers and Trusts Law § 4-1.4 to disqualify Jairo Polanco Muñoz's biological father as a potential taker of the estate's assets based on his abandonment and failure to support Jairo. The mediation did not produce a resolution, and none appears likely in the short term. The Surrogate's Court will conduct a discovery planning conference with the parties on December 7, 2021, after which we intend to move as expeditiously as possible towards a just resolution of the estate litigation.

With this Court's permission, we intend to submit another status letter to Your Honor by the end of January. We thank the Court for its patience and wish it a happy and safe holiday season.

Respectfully submitted,



Robert M. Quackenbush

cc: Counsel of record (via ECF)